



Annual Performance Report Form

Facility Name: Torrington Company- Cairo

Performance Track ID #: A040029

Annual Performance Report #: 1

Reporting Year: 2001

Due Date: July 1, 2002

Section A

General Facility Information

To the extent possible, EPA will pre-complete items A.1-A.8 for you. Please ensure that the information in A.1-A.8 below is accurate, complete, and up to date. Please supply or revise any information as necessary and then check the box to the left of the item(s) to indicate where changes have been made. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

Did you make changes? If so, check box.

- A.1 ☐ Name of your facility: Torrington Company- Cairo
- A.2 ☐ Name of your parent company: Ingersoll-Rand
- A.3 ☐ Facility contact person for the Performance Track program
Name: Mr./Mrs./Ms./Dr. Dan Lewis
Title: Materials Manager
Phone: 229/377-6650 Fax: 229/377-8165 E-mail: dan_lewis@irco.com
- A.4 ☐ Facility's location
Street Address: 2525 Torrington Drive
Street Address (cont.): P.O. Box 2449
City/State/Zip Code: Cairo/GA/39828
- A.5 ☐ Facility's website address (if any): www.torrington.com
- A.6 ☐ Number of employees (full-time equivalents) who currently work in the facility:
☐ Fewer than 50 ☐ 50 - 99 ☐ 100 - 499 ☒ 500 - 1000 ☐ More than 1000
- A.7 ☐ Does your company meet the Small Business Administration definition of a small business for your sector? ☐ Yes ☒ No
- A.8 ☐ North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility: 332991 _____
- A.9 ☐ In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them in the space below. ☐ Yes ☒ No
- A.10 ☐ Please update the list of environmental requirements that apply to your facility. In the space below, indicate any changes that have taken place during this reporting period. If you have no changes to report, please write "No changes."
No changes

Section B

Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*. Attach additional sheets as necessary.

a. Was an EMS audit or other assessment done by an independent third party?

☒ Yes ☐ No

If yes, please provide the *type* (e.g., ISO 14001 certification), the *scope*, and the *dates* (mo/yr) of each assessment.

Pre-assessment, Comprehensive assessment of EMS, 11/01

Certification, Comprehensive assessment of EMS, 2/02

b. Was an internal or corporate EMS audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit.

Internal assessments of EMS elements (i.e. Level 1-4 procedures/instructions, policy, aspects, targets, and training) are completed on a monthly basis.

c. Was a compliance audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit, and indicate *who* conducted the audit(s) (e.g., facility staff, corporate groups, third party).

Comprehensive HSE compliance audit, 11/01, Jack Healy, Chief Project Engineer (Corporate)

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

Section B

(continued)

B.1

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audits.

Audit Finding

Objective evidence that control and influence of normal/abnormal conditions were considered when determining aspects was not available.

Corrective Action

Within the new Torrington Aspect/Impact Database, normal and abnormal conditions are identified and must be checked off in the Aspect/Impact ID review process.

Audit Finding

Not clearly evident that objectives/targets considered legal & other requirements, technological, financial, and operational requirements and views of interested parties when establishing/reviewing objectives and targets.

Corrective Action

A new spreadsheet and chart was generated for all Torrington plants to use which shows all categories to consider during the aspect/impact ID process.

Audit Finding

Procedures do not reflect how EMPs are to be tracked, managed and information documented and reviewed.

Corrective Action

Additional workplace instructions were written for individual EMP projects.

Audit Finding

Additional workplace instructions were written for individual EMP projects.

Audit Finding

Waste treatment instructions were not controlled and kept as a record.

Corrective Action

Procedures were written for pH and flow, and calibrations were added to TMS systems.

Audit Finding

It is not clear how to track when/who performs review of document control system.

Corrective Action

Revised procedure instructing how/when the documents are reviewed. It was decided that each element will be an audit and all documents for that element would be reviewed at that time by the lead auditor.

Audit Finding

Procedures not identified/established for operations/activities that deviate from environmental policy/objectives/targets.

Corrective Action

Workplace instructions/operational control have been written for both waste streams generated at the plant and for the EMO projects the plant selected.

Audit Finding

Documented procedures have not been identified/established to monitor/measure key characteristics of its operations/activities that can have a significant impact.

Corrective Action

Operational controls have been written, and in the procedure/instruction any monitoring or measuring to be completed is identified/listed/recorded.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

☐ Yes ☒ No ☐ No such instances identified

If no, please explain your plans to correct these instances. Of the total number of 51 nonconforming conditions and observations from the audits, 28 have been completed. Those not yet completed are from the most recent 2/02 audit and are currently being worked on. Please note, in an effort to be proactive in identifying potential nonconformances, corrective actions were adopted based on audit results from other Torrington facilities. This resulted in a higher number of non-conforming conditions/observations for the Cairo plant.

g. When was the last Senior Management review of your EMS completed? *mo/yr* 06/02

Who headed the review?

Name: Mr./Mrs./Ms./Dr. Mr.Chris Addleton

Title: Plant Manager

Section B

(continued)

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001? ☒ Yes ☐ No

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects? *mo/yr* 02/02

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the *reporting year*.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
Water	See Section C
Hazardous Waste	See Section C
Non-hazardous Waste	See Section C
Energy- Electricity	See Section C

Section C

Environmental Performance Commitments

Please use the tables on pages 6-9 to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment. If any of the boxes have been pre-completed for you, please verify the information. If you find information that is incorrect, cross it out and write in the correct information. **Leave blank any columns for future reporting years.**

C.1

Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category (see page 16 of the instructions): Water Use

Aspect (see page 16 of the instructions): Total Water Use

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	36,250,000	35,210,000			35,890,000 (optional)
<i>Measurement Units</i>	gallons				
<i>Normalizing Factor*</i>	1.0	NA			1 (optional)
<i>Basis for your Normalizing Factor*</i>	Due to product rationalizing (involving relocation of production processes) across Torrington facilities, there is no normalizing factor that would meaningfully compare the facility's level of operations between 1999 and 2001. Torrington will supply such a factor when the processes are stabilized.				
<i>Normalized Quantity* (per year)</i>	36,250,000	NA			35,890,000

*See pages 17-19 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

GOAL EXCEEDED

The facility recognizes the need to reduce water consumption and will continue to identify/implement programs to decrease water demand. The following represents how the facility achieved this goal:

- * The goal for 2001 was to meet with contractors so they could develop and provide estimates on the design and implementation of a cooling tower water recycling system.

- * A swarf management system was installed which allows oils to be recycled, and reduces water consumption by recycling water.

Going Forward the goal is to install/implement the cooling tower water recycle system, thereby reducing wastewater discharge by an average of 33,000 gpd.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.2 Performance Commitment 2

a. Use this table to report data related to your second performance commitment.

Category (see page 16 of the instructions): Waste					
Aspect (see page 16 of the instructions): Hazardous Solid Waste					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	0	0			0 (optional)
<i>Measurement Units</i>	lbs				
<i>Normalizing Factor*</i>	1.0	NA			1 (optional)
<i>Basis for your Normalizing Factor*</i>	Due to product rationalizing (involving relocation of production processes) across Torrington facilities, there is no normalizing factor that would meaningfully compare the facility's level of operations between 1999 and 2001. Torrington will supply such a factor when the processes are stabilized.				
<i>Normalized Quantity* (per year)</i>	0	NA			0
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The facility continues to maintain the Torrington Company objective of 0 hazardous waste generation.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.3

Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

Category (see page 16 of the instructions): Waste

Aspect (see page 16 of the instructions): Total Solid Waste

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2001	2001			2003
<i>Actual Quantity (per year)</i>	883,873	883,873			875,000 (optional)
<i>Measurement Units</i>	lbs				
<i>Normalizing Factor*</i>	1.0	1.0			1 (optional)
<i>Basis for your Normalizing Factor*</i>	NA. Due to changes in information collection, 2001 data now forms the basis for this commitment.				
<i>Normalized Quantity* (per year)</i>	883,873	883,873			875,000

*See pages 17-19 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The Torrington Company's ability to track and measure the amounts of waste (both hazardous and non hazardous wastes) has improved since the Baseline Reporting year of 1999 through the implementation of a standardized Company-wide database. This waste tracking system was implemented for calendar year 2001 as part of the continuous improvement processes implemented simultaneously with the attaining of Certification of our EMS to ISO 14001. The result of implementing this system has been improved data capture and the ability to segregate waste based on types (i.e. swarf, coolant, scrap metal, etc). This presents a challenge when reporting performance improvements associated non hazardous waste generation in years 2001 and beyond when using 1999 as the baseline year. Reductions in the generation of non hazardous waste remain a focus of each Torrington Company Facility, The Torrington Company overall and its parent company Ingersoll Rand. At the individual facility level each plant has implemented at least one program focused on the continued reduction in the amounts of non hazardous waste generated. Intuitively, the Management of The Torrington Company recognizes that these programs have resulted in performance improvements. However, these improvements are not able to be reflected in the reported 2001 numbers because overall the Torrington Company is much better at tracking and reporting the information. Therefore, without compromising our performance commitments it is the position of the Torrington Company that the year 2001 data as reported become the baseline against which achievement of our previously stated performance commitments for 2003 be measured.

Additionally, and for reporting year 2001 and beyond the actual number reported for non hazardous waste is indicative of the amounts of non hazardous waste disposed of by the plants. The amounts of wastes that are reused/recycled (either in Torrington processes or outside of Torrington) are specifically excluded because it is through the implementation of concerted reuse, recycle programs by which the Torrington Company Plants will achieve their performance goals. Overall the Cario facility for 2001 recycled/reused 3.7 Million pounds of materials.

Specific Programs implemented to reduce the amount of non hazardous wastes disposed of include:

- Wooden Pallet Management. With the cooperation of various suppliers returnable wooden pallets are now in use. The goal for 2002 is to meet additional suppliers and to negotiate the same arrangement.
- Swarf Management. A new swarf management system has been installed allowing oil recycling, thereby generating less waste to be disposed.
- Scrap Metal Management. The facility has eliminated intermediate processing of scrap and associated wastes generated as a result of that processing step.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.4 Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

Category (see page 16 of the instructions): Energy Use

Aspect (see page 16 of the instructions): Total Energy Use

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	36,320,000	33,400,000			35,960,000 (optional)
<i>Measurement Units</i>	KwH				
<i>Normalizing Factor*</i>	1.0	NA			1 (optional)
<i>Basis for your Normalizing Factor*</i>	Due to product rationalizing (involving relocation of production processes) across Torrington facilities, there is no normalizing factor that would meaningfully compare the facility's level of operations between 1999 and 2001. Torrington will supply such a factor when the processes are stabilized.				
<i>Normalized Quantity* (per year)</i>	36,320,000	NA			35,960,000

*See pages 15-17 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Goal Exceeded with an overall 8% reduction in electricity usage.

Through awareness, electricity usage has been more effectively managed with focused programs under way. An example program is associated with lights and is described below:

* Cairo is implementing a phased system to decrease their lighting energy consumption. First, the facility will replace all of the 400 watt bulbs with new 350 watt bulbs and ballast, (the new bulbs offer longer life and higher candlepower resulting in a warmer, brighter light). The facility is currently completing this phase. Phase 2 involves the installation of a computerized lighting management system (LMS) to allow automatic shutoff of lights at specified times on the weekends. This phase should be completed by the end of 2002. * New and more efficient air conditioning controls will be added to reduce electricity consumption. Additionally, the use of gas heaters will be discontinued, to be replaced with more energy efficient equipment.

Going forward (2002 and beyond) to Cairo Facility expects to see an increase in electrical usage due to the addition of a new production line at the facility. This new line includes an electric furnace. For (2002 and 2003) this will require the application of a normalizing factor when compared to the baseline year (1999).

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).
None

Section D

Public Outreach and Performance Reporting

D.1

Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).

* Facility personnel provided Hazardous Materials training to the local Fire Department at no charge.

* The Plant Manager is on the local Chamber of Commerce and was the 2001 President.

* The Plant Manager is also a member of the local Vocational Technical College

D.2

Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check as many as are appropriate.

☒ Website (URL www.torrington.com)

☐ Open House

☐ Meetings

☐ Press Releases

☐ Community Advisory Panel

☐ Other

Section E

Self-Certification of Continued Program Participation

On behalf of Torrington-Cairo,
(name of my facility)

I certify that

- ◆ I have read and agree to the terms and conditions specified in *the National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- ◆ I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- ◆ My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- ◆ My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance; and
- ◆ Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date _____

Printed Name Mr./Mrs./Ms./Dr.Mr. Chris Addleton

Title Plant Manager

Phone Number/E-mail Address 229/377-6650

Facility Name chris_addleton@irco.com

Facility Street Address The Torrington Company- Cairo

Performance Track Identification Number A040029

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.